

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

IN THE MATTER OF:

WASTE COLLECTION, CORP.

81 Ave. Muñoz Rivera
San Juan, Puerto Rico 00918

Solid Waste Transfer Station
Road PR-1, Km. 49.2
Parcelas Nuevas Sector, Beatriz Ward
Cidra, Puerto Rico

NPDES ID: PRU098543

RESPONDENT

Proceeding pursuant to Section 309(a) of the Clean
Water Act, 33 U.S.C. § 1319(a)

**ADMINISTRATIVE
COMPLIANCE ORDER**

**DOCKET NUMBER
CWA-02-2020-3104**

I. STATUTORY AUTHORITY

1. This Administrative Compliance Order (“Order”) is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency (“EPA” or “Agency”) pursuant to Section 309(a) of the Clean Water Act (“CWA” or the “Act”), 33 U.S.C. § 1319(a).
2. The Administrator has delegated the authority to take these actions to the Regional Administrator of Region 2, who in turn, has delegated such authority to the Director of the Caribbean Environmental Protection Division (“CEPD”).
3. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), provides in part that “[e]xcept as in compliance with [CWA Section 402], the discharge of any pollutant by any person shall be unlawful.”
4. Section 402 of the CWA, 33 U.S.C. § 1342, defines the National Pollutant Discharge Elimination System (“NPDES”) as the national program for, among other things, issuing and enforcing discharge permits.

5. Section 402(a)(1) of the Act, 33 U.S.C. § 1342(a)(1), provides that “the Administrator may, after opportunity for public hearing, issue a permit for the discharge of any pollutant.... upon condition that such discharge will meet.... such requirements as the Administrator determines are necessary to carry out the provisions of the [CWA].”
6. Section 402(p)(2)(B) of the CWA authorizes the Administrator of EPA to issue NPDES permits to storm water discharges associated with industrial activity.
7. Pursuant to Section 402(p)(3)(A) of the CWA, 33 U.S.C. § 1342(p)(3)(A), permits for discharges associated with industrial activity shall meet all applicable provisions of Sections 402 and 301 of the CWA, 33 U.S.C. §§ 1342 and 1311.
8. Section 402 of the CWA authorizes the Administrator to promulgate regulations for the implementation of the NPDES requirements.
9. Pursuant to the CWA, EPA promulgated regulations known as “EPA Administered Permit Programs: the National Pollutant Discharge Elimination System,” which was codified at 40 C.F.R. Part 122, as amended.
10. Pursuant to 40 C.F.R. § 122.1(b)(1), the NPDES Permit Program requires permits for the discharge of any pollutant from any point source into waters of the United States.
11. Pursuant to 40 C.F.R. § 122.21(a)(1), any person who discharges or proposes to discharge pollutants, and who does not have an effective permit, must submit a complete NPDES permit application to EPA.
12. Pursuant to 40 C.F.R. § 122.26(b)(14), certain categories of facilities are considered to be engaging in industrial activity and are required to obtain an NPDES permit for storm water discharges associated with industrial activity.
13. Pursuant to 40 C.F.R. § 122.26(b)(14)(viii), certain transportation facilities, which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations, were included in the definition of storm water associated with industrial activity.
14. Pursuant to 40 C.F.R. § 122.26(g), discharges composed entirely of storm water are not storm water discharges associated with industrial activity if there is “no exposure” of industrial materials and activities to rain, snow, snowmelt and/or runoff, and the discharger satisfies the conditions in 40 C.F.R. § 122.26(g)(1) through (g)(4).
15. Pursuant to 40 C.F.R. § 122.26(g)(1), for an operator of a facility to qualify for an NPDES permit exclusion for storm water discharges associated with industrial activity must, among other requirements:
 - a. provide a storm-resistant shelter to protect industrial materials and activities from exposure to rain, snow, snow melt, and runoff;

- b. complete and sign (according to 40 C.F.R. § 122.22) a certification that there are no discharges of storm water contaminated by exposure to industrial materials and activities from the entire facility, except as provided in paragraph (g)(2) of 40 C.F.R. § 122.26;
 - c. submit the signed certification to the NPDES permitting authority [EPA] once every five (5) years;
 - d. allow the Director to inspect the facility to determine compliance with the “no exposure” conditions; and
 - e. allow the Director to make any “no exposure” inspection reports available to the public upon request.
16. The CWA and its implementing NPDES regulations contain the following definitions:
- a. “Administrator” means the Administrator of EPA, or an authorized representative. 40 C.F.R. § 122.2;
 - b. “Best Management Practices” or “BMPs” mean schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of “waters of the United States.” BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. 40 C.F.R. § 122.2;
 - c. “discharge of a pollutant” means any addition of any pollutant to navigable waters and/or waters of the United States from any point source. Section 502(12) of the CWA, 33 U.S.C. § 1362(12), and 40 C.F.R. § 122.2;
 - d. “facility” means any NPDES point source or any other facility or activity (including land or appurtenances thereto) that is subject to the regulations of the NPDES program. 40 C.F.R. § 122.2;
 - e. “industrial activity” means the eleven categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 C.F.R. §§ 122.26(b)(14)(i)-(xi);
 - f. “navigable waters” means the waters of the United States, including the territorial seas. Section 502(7) of the CWA, 33 U.S.C. § 1362(7);
 - g. “no exposure” means that all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include

the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. 40 C.F.R. § 122.26(g);

- h. “owner” or “operator” means the owner or operator of any facility or activity subject to regulation under the NPDES program. 40 C.F.R. § 122.2;
 - i. “permit” means an authorization, license, or equivalent control document issued by EPA or an “approved State” to implement the requirements of 40 C.F.R. Parts 122, 123 and 124. The term “permit” does not include any permit which has not yet been subject of final agency action, such as a “draft permit” or a “proposed permit.” 40 C.F.R. § 122.2;
 - j. “person” means an individual, corporation, partnership or association. Section 502(5) of the CWA, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2;
 - k. “point source” means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. Section 502(14) of the CWA, 33 U.S.C. § 1362(14), and 40 C.F.R. § 122.2;
 - l. “pollutant” includes solid waste, dredged spoil, rock, sand, cellar dirt, sewage, sewage sludge and industrial, municipal and agricultural waste discharged into water. Section 502(6) of the CWA, 33 U.S.C. § 1362(6), and 40 C.F.R. § 122.2;
 - m. “storm water associated with industrial activity” means the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. 40 C.F.R. §§ 122.2 and 122.26(b)(14); and
 - n. “waters of the United States” means the term as is defined in 40 C.F.R. § 120.2, as follows:
 - a. the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including waters which are subject to the ebb and flow of the tide;
 - b. tributaries;
 - c. lakes and ponds, and impoundments of jurisdictional waters; and
 - d. adjacent wetlands.
17. On June 4, 2015, EPA re-issued the NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (the “2015 MSGP”), as authorized under

Section 402(p)(2)(B) of the CWA, 33 U.S.C. § 1342(p)(2)(B). The 2015 MSGP became effective on June 4, 2015 and expired on June 3, 2020.

18. EPA did not reissue a new NPDES permit prior to the expiration of the 2015 MSGP. Therefore, the 2015 MSGP has been administratively continued in accordance with the Administrative Procedure Act, 5 U.S.C. § 558(c), and 40 C.F.R. § 122.6, and remains in force and effect for those operators of facilities with storm water discharges associated with industrial activity that had obtained 2015 MSGP coverage prior to its expiration.¹
19. The 2015 MSGP established permit coverage filing requirements, development and implementation of a Storm Water Pollution Prevention Plan (“SWPPP”), inspections, monitoring, reporting, recordkeeping and other special and general conditions.
20. Part 1.2. of the 2015 MSGP established the eligibility criteria and Notice of Intent (“NOI”) filing requirements for operators of industrial activities to be covered under the permit.
21. Appendix A of the 2015 MSGP defined the term “operator” as any entity with a storm water discharge associated with industrial activity that meets either of the following two (2) criteria:
 - a. the entity has operational control over industrial activities, including the ability to modify those activities; or
 - b. the entity has day-to-day operational control of activities at a facility necessary to ensure compliance with the permit.
22. Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), provides that “[w]henever on the basis of any information available . . . the Administrator finds that any person is in violation of [CWA Sections 301 and 308], or is in violation of any permit condition or limitation implementing any of such sections in a permit issued under [Section 402 of the Act, the Administrator] shall issue an Order requiring such person to comply with such section....”
23. Section 309(a)(5)(A) of the CWA, 33 U.S.C. § 1319(a)(5)(A), provides that “[a]ny Order issued under [CWA Section 309] shall be by personal service, shall state with reasonable specificity the nature of the violation, and shall specify a time for compliance . . . taking into account the seriousness of the violation and any good faith efforts to comply with applicable requirements.”
24. EPA is the agency within the Commonwealth of Puerto Rico with authority to administer the NPDES Program. EPA maintains enforcement authority for violations of the Act and its implementing regulations under Section 309 of the Act.

¹ More information about the expiration of EPA’s 2015 MSGP and its administratively continuance is found at <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>.

II. FACTUAL FINDINGS

25. Waste Collection, Corp. (“Respondent” or “WCC”) is a for-profit corporation organized under the laws of the Commonwealth of Puerto Rico. Respondent was registered in the Puerto Rico Department of State on September 5, 2012, under registration number 316,491.
26. Respondent is the current owner and/or operator of a solid waste transfer station located at Road PR-1, Km. 49.2, Parcelas Nuevas Sector, Beatriz Ward, Cidra, Puerto Rico (the “SW Transfer Station”).
27. Respondent’s main industrial activity at the SW Transfer Station involves collection and transportation of garbage to landfills in the Commonwealth of Puerto Rico.
28. The industrial activity performed at the SW Transfer Station is best described by the Standard Industrial Classification (“SIC”) Code 4212, as defined in 40 C.F.R. § 122.26(b)(14)(viii).²
29. On May 2, 2019, an EPA official reviewed EPA’s Storm Water Notice of Intent database (the “SW NOI Database”) and EPA’s files located at CEPD office in Guaynabo, Puerto Rico, in order to determine if Respondent had obtained NPDES permit coverage for the SW Transfer Station (the “May 2019 Review”). The May 2019 Review revealed that Respondent neither submitted an electronic NOI under the 2015 MSGP or an individual NPDES permit application seeking coverage for its discharges of pollutants in storm water associated with industrial activity from the SW Transfer Station into a water of the United States.
30. On May 2, 2019, an EPA official conducted an NPDES Stormwater Inspection (the “Inspection”) of the SW Transfer Station. The purpose of the Inspection was to evaluate Respondent’s compliance with the NPDES storm water permit application regulations in 40 C.F.R. § 122.26, as it relates to the operations of the SW Transfer Station.
31. The findings of the Inspection were summarized in an Inspection Report (the “Inspection Report”), dated October 9, 2019.
32. As part of the Inspection, the EPA official performed a walkthrough of the SW Transfer Station, which revealed, among other things, the following:
 - a. Lack of storm water erosion and sediment controls, storm water runoff management measures, and BMPs implementation at the truck staging area, loading and unloading areas, and access road entrance/exit point where track-out of sediments could occur.

² The description of SIC Code 4212 (Local Trucking Without Storage) includes garbage, for local collecting and transporting without disposal, and it is found at https://www.osha.gov/pls/imis/sic_manual.display?id=902&tab=description.

- b. Storm water runoff from the truck staging area of the SW Transfer Station may flow into a Beatriz Creek.
 - c. Ongoing loading and unloading activities of domestic waste were not observed.
 - d. Storm water runoff discharges from the SW Transfer Station into Beatriz Creek were not being monitored.
 - e. Lack of a wheel washing station or other controls to minimize sediment track-out.
33. Pursuant to Section 308(a) of the Act, 33 U.S.C. § 1318(a), in a letter dated November 5, 2019, EPA requested information from Respondent to further investigate whether or not Respondent was in violation of Section 301(a) of the CWA (the “RFI Letter”). EPA, among others, requested information about the operations performed at the SW Transfer Station, including but not limited to, those portions that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), and equipment cleaning operations. A copy of the Inspection Report was included as part of the RFI letter.
34. On December 5, 2019, Respondent hand-delivered its response to the RFI letter. As part of its response to the RFI letter, Respondent, among others, confirmed that the operation of the SW Transfer Station includes a vehicle maintenance workshop, and a vehicle and equipment storage area. In addition, Respondent indicated that it had “[hired the services of the engineer Edwin D. Ortiz, for the preparation of the Storm water Pollution Prevention Plan (SWPPP) and filing of the corresponding permit.”
35. On June 3, 2020, EPA issued a No Action Assurance (“NAA Policy”) setting forth the conditions under which operators of certain industrial facilities would discharge storm water associated with industrial activity in the period between the June 3, 2020 expiration of EPA’s 2015 MSGP and the effective date of a new NPDES permit that will replace the 2015 MSGP.³
36. Specifically, the conditions of the NAA Policy that eligible facilities/operators must meet are as follows:
- a. meet the 2015 MSGP eligibility criteria;
 - b. prior to the discharge of storm water associated with industrial activity, provide EPA thirty (30) days advance notice of their operator status and their intention to operate in accordance with the 2015 MSGP by submitting an “Intent to Operate” (“ITO”) form through the NPDES eReporting Tool (“NeT”) for 2015 MSGP;

³ A copy of the NAA Policy is found at <https://www.epa.gov/enforcement/no-action-assurance-national-pollutant-discharge-elimination-system-stormwater-multi>.

- c. satisfy all requirements of the 2015 MSGP (except those pertaining to submission of an electronic NOI); and
 - d. if the operator of the facility intends to continue discharging after the effective date of the re-issued MSGP, submit an electronic NOI for coverage under the re-issued MSGP within ninety (90) days of its effective date.
37. On August 25, 2020, an EPA official reviewed the SW NOI Database in order to determine if Respondent had obtained 2015 MSGP coverage for the SW Transfer Station (the “2nd Review”). The 2nd Review revealed that WCC did not submit a NOI seeking coverage under the 2015 MSGP prior to its expiration date for its discharges of pollutants in storm water associated with industrial activity from the SW Transfer Station into Beatriz Creek.

III. CONCLUSIONS OF LAW AND FINDINGS OF VIOLATIONS

38. Respondent is a “person” pursuant to Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.
39. The SW Transfer Station is a “facility”, as defined in 40 C.F.R. § 122.2.
40. The SW Transfer Station is a “point source” pursuant to Section 502(14) of the CWA, 33 U.S.C. § 1362(14), and 40 C.F.R. § 122.2.
41. Discharges of storm water runoff containing “pollutants” associated with industrial activities from the SW Transfer Station reach a drainage ditch that conveys the storm water runoff into Beatriz Creek, which is a tributary of La Plata River, which in turn discharges into the Atlantic Ocean.
42. The Beatriz Creek, La Plata River and Atlantic Ocean are “waters of the United States” pursuant to Section 502(7) of the CWA, 33 U.S.C. § 1362(7), and 40 C.F.R. § 122.2.
43. Respondent was required to apply for and obtain NPDES permit coverage for the SW Transfer Station’s discharges of pollutants into a water of the United States pursuant to Section 402(p) of the CWA, 33 U.S.C. § 1342(p) and its implementing NPDES regulations at 40 C.F.R. § 122.
44. Respondent failed to file a NOI to obtain NPDES permit coverage under the 2015 MSGP prior to its expiration date on June 3, 2020 for its discharges of pollutants in storm water associated with industrial activity from the SW Transfer Station into a water of the United States.
45. Respondent’s discharges of storm water associated with industrial activities containing pollutants into waters of the United States without a NPDES permit constitute a violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a), and the applicable NPDES regulations; therefore, Respondent is subject to an enforcement action under Section 309 of the Act, 33 U.S.C. § 1319.

IV. ORDERED PROVISIONS

In consideration of the Conclusions of Law and Findings of Violations, and the NAA Policy, above, and pursuant to the authority in Section 309(a) of the CWA, 33 U.S.C. § 1319(a), EPA has determined that compliance with the following ordered provisions is reasonable.

IT IS HEREBY ORDERED:

46. **Within five (5) calendar days upon receipt of this Order by electronic mail** (“email”), an authorized representative of Respondent shall complete the acknowledgment of receipt included as Attachment of this Order and return it via email to the Team Leader, Clean Water Act Team, Multimedia Permits and Compliance Branch, Caribbean Environmental Protection Division, to email address identified in Paragraph 53, below. As soon as viable under the current COVID-19 emergency and considering the executive orders issued by the Governor of the Commonwealth of Puerto Rico, Respondent shall send to the Team Leader, by certified mail (or its equivalent), the signed acknowledgement of receipt.
47. Pursuant to Section 301(a) of the Act, 33 U.S.C. § 1311(a), Respondent shall not discharge storm water associated with industrial activity from the SW Transfer Station into the Beatriz Creek, except with authorization under an NPDES permit issued pursuant to the provision of Section 402 of the Act, 33 U.S.C. § 1342.
48. Pursuant to Section 301(a) of the Act, 33 U.S.C. § 1311(a), Respondent shall not discharge vehicle/equipment/surface wash water, including wash water related with tank cleaning operations from the SW Transfer Station into the Beatriz Creek, except with authorization under an NPDES permit issued pursuant to the provision of Section 402 of the Act, 33 U.S.C. § 1342.
49. **Within thirty (30) calendar days of receipt of this Order by electronic mail,** Respondent shall prepare and submit for review, a Plan of Action (“POA”), to bring the SW Transfer Station into compliance with Sections 301(a) and 402(p) of the CWA, and its implementing NPDES storm water permit application regulations codified in 40 C.F.R. § 122.26. The POA shall include, at a minimum:
 - a. a detailed description of the NPDES regulatory and permitting option, or combination of options that Respondent will be seeking and implementing at the SW Transfer Station to address the NPDES permit application regulations under 40 C.F.R. § 122.26;⁴
 - b. the specific tasks to be performed, including a schedule with the expected completion date for each task; and

⁴ For compliance assistance purposes only, EPA indicates hereby potential options that include, but are not limited to: (1) written certification that Respondent eliminated all industrial activities at the SW Transfer Station, as described in 40 C.F.R. § 122.26(b)(14)(viii); (2) submittal of an electronic “No Exposure Certification” through the NPDES eReporting Tool at NeT-MSGP; or (3) submittal of electronic “ITO Form”, per NAA Policy. For more information about these options is available at <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>.

- c. the estimated costs for each task which will be required to implement the POA.

The tasks in the POA shall be undertaken as quickly as possible, but in no case the completion date of all required activities shall be beyond sixty (60) calendar days from the receipt date of this Order by electronic mail.

50. **Until Termination of this Order**, Respondent shall submit Monthly Progress Reports ("MPR") that, at a minimum, describe the status and progress of Respondent's actions taken to comply with this Order. Respondent shall submit each MPR no later than the fifteenth (15th) calendar day of the month following the month subject to the reporting period. The first MPR is due on November 15, 2020.

V. **GENERAL PROVISIONS**

51. Any questions concerning this Order should be directed to Jaime López, Enforcement Officer, Clean Water Act Team, Multimedia Permits and Compliance Branch, Caribbean Environmental Protection Division, and who can immediately be reached at (787) 977-5851, or by email at lopez.jaime@epa.gov.
52. Any documents to be submitted by Respondent as part of this Order shall be sent by electronic mail and by certified mail (or its equivalent) as soon as viable considering the current COVID-19 emergency and executive orders issued by the Governor of the Commonwealth of Puerto Rico, and shall be signed by an authorized representative of the Respondent (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

53. All information required to be submitted under this Order shall be sent by electronic mail and by certified mail (or its equivalent) as soon as viable considering the current COVID-19 emergency and executive orders issued by the Governor of the Commonwealth of Puerto Rico to the following addresses:

Director, Water Quality Area
Puerto Rico Department of Natural and Environmental Resources
P. O. Box 11488
San Juan, Puerto Rico 00910

and

Team Leader, Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
48 RD. 165 Km. 1.2
Guaynabo, PR 00968-8069
Telephone Number: (787) 977-5842
Email: rivera.jose@epa.gov.

54. Respondent shall have the opportunity, for a period of twenty (20) days from the effective date of this Order, to confer, regarding the requested information and the Ordered Provisions, with the following designated Agency representative: Mr. José A. Rivera and/or Mr. Jaime López, Clean Water Act Team, Multimedia Permits and Compliance Branch, Caribbean Environmental Protection Division located at City View Plaza II – Suite 7000, 48 RD 165, Km 1.2, Guaynabo, Puerto Rico. Mr. Rivera telephone number is (787) 977-5842 and email is rivera.jose@epa.gov. Mr. López telephone number is (787) 977-5851, and email is lopez.jaime@epa.gov.

EPA expects that Respondent will present and discuss its preferred option to comply with Paragraphs 49 and 50 of this Order.

55. Respondent has the right to seek immediate federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. Section 706, which is set forth at <http://uscode.house.gov/download/pls/05C7.txt>, provides the grounds for such review.
56. This Order does not constitute a waiver from compliance with, or a modification of, the effective terms and conditions of the CWA, the NPDES implementing regulations, or any applicable permit, which remain in full force and effect. This Order is an enforcement action taken by EPA to ensure swift compliance with the CWA. Issuance of this Order shall not be deemed an election by EPA to forego any civil or criminal actions for penalties, fines, imprisonment, or other appropriate relief under the CWA.
57. Notice is hereby given that should EPA commence an action in a United States District Court for a violation of any Ordered Provision of this Order, Respondent may be subject to: (1) civil penalties up to \$55,800 per day for each day of violation that occurred after November 2, 2015, pursuant to Section 309(d) of the Act, 33 U.S.C. § 1319(d); and/or (2) injunctive relief, pursuant to Section 309(b) of the Act, 33 U.S.C. § 1319(b), as imposed by the Court.
58. If any provision of this Order is held by a court of competent jurisdiction to be invalid, any surviving provisions shall remain in full force and effect.

59. Any violation of this Order may be grounds for EPA to terminate this Order in its sole discretion.
60. This Order shall become effective upon the date of execution by the Director, Caribbean Environmental Protection Division.

Dated: September 30, 2020

Signed:

CARMEN R. GUERRERO PÉREZ

Director

Caribbean Environmental Protection Division

Attachment

cc: Director, Water Quality Area
Puerto Rico Department of Natural and Environmental Resources